



October 30, 2012

Public Comment  
Utah Division of Air Quality  
195 North 1950 West  
P.O. Box 144820  
Salt Lake City, Utah 84114-4820

RECEIVED

OCT 30 2012

DEPARTMENT OF  
ENVIRONMENTAL QUALITY  
DIVISION OF AIR QUALITY

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DIVISION OF AIR QUALITY

Re: Proposed PM<sub>2.5</sub> State Implementation Plan rules R307-110-17 and R307-110-10.

Dear Mr. Bird:

This letter is in response to the Utah Division of Air Quality's proposed PM<sub>2.5</sub> State Implementation Plan (SIP). PacifiCorp has two facilities, Gadsby and Lake Side plants, that have been identified as point sources and are subject to the PM<sub>2.5</sub> SIP. PacifiCorp has comments on two proposed rules, R307-110-17 and R307-10-10 respectively. The following are PacifiCorp's comments:

#### **R307-110-17**

##### **Gadsby Plant**

The Gadsby plant is referenced in section IX.H.12.p.i of the SIP, which establishes a limit of 6.57 tons per day of Nitrogen Oxides (NO<sub>x</sub>). The section states:

*"NO<sub>x</sub> emissions from each turbine shall be based on a rolling 30 day average."*

Gadsby's current Title V operating permit 3500068003, states that the 30 day rolling average is based on "steady state operation not including startup and shutdown." Each combustion turbine is equipped with selective catalytic reduction which is placed in service as soon as operationally possible, but cannot be utilized until the equipment has reached the appropriate temperatures. PacifiCorp requests that the calculation of total NO<sub>x</sub> emissions be modified to reflect the same definition that is contained in condition II.B.3.a of the facility's current Title V permit. PacifiCorp suggests the following language:

*The combustion turbine NO<sub>x</sub> emissions shall be based on a rolling 30 day average which includes each unit's total emissions under steady state operation not including startup and shutdown.*

##### **Lake Side Plant**

The Lake Side plant is referenced in section IX.H.13.d of the SIP. The SIP contains separate conditions for Block #1 and Block #2.

The Block #1 section states in part:



*A. The owner/operator shall not discharge or cause the discharge into the atmosphere from each Turbine/HRSG stack:*

*II. Nitrogen Oxides (NO<sub>x</sub>) in excess of two ppmvd at 15 percent oxygen on a three-hour average*

The Block #2 section states in part:

*A. The owner/operator shall not discharge or cause the discharge into the atmosphere from each turbine/heat recovery steam generator (HRSG) stack:*

*II. Nitrogen Oxides (NO<sub>x</sub>) in excess of two ppmvd at 15 percent oxygen on a three-hour average*

*III. Volatile Organic Compounds (VOC) in excess of 2.8 ppmvd at 15 percent oxygen on a three-hour average*

Lake Side's current Approval Order DAQE-AN0130310010-11 contains footnotes stating the limits for NO<sub>x</sub> and VOC are "under steady state operation." The Approval Order defines "steady state operations as all periods of combustion turbine operation, except for periods of startup and shutdown and periods of transient load conditions" and limits the amount of times the units can operate in startup/shutdown and transient load conditions. Each of the combined cycle turbines is equipped with low NO<sub>x</sub> burners, selective catalytic reduction and oxidation catalyst which are placed in service as soon as operationally possible, but cannot be utilized until the equipment has reached the appropriate temperatures. PacifiCorp requests that the calculation of three-hour average limits for NO<sub>x</sub> and VOC emissions be modified to reflect conditions II.B.2.b, II.B.2.e, II.B.2.f, II.B.3.b, II.B.3.e and II.B.3.f of the facility's current Approval Order. PacifiCorp suggests the following language:

The Block #1 section:

*A. The owner/operator shall not discharge or cause the discharge into the atmosphere from each Turbine/HRSG stack:*

*II. Nitrogen Oxides (NO<sub>x</sub>) in excess of two ppmvd at 15 percent oxygen on a three-hour average\**

*\*Under steady state operation not including startup and shutdown and transient load conditions.*

The Block #2 section:

*A. The owner/operator shall not discharge or cause the discharge into the atmosphere from each turbine/heat recovery steam generator (HRSG) stack:*



*II. Nitrogen Oxides (NOx) in excess of two ppmvd at 15 percent oxygen on a three-hour average\**

*III. Volatile Organic Compounds (VOC) in excess of 2.8 ppmvd at 15 percent oxygen on a three-hour average\**

*\*Under steady state operation not including startup and shutdown and transient load conditions.*

**R307-110-10**

In subsection IX.A.21.9.2 and subsection IX.A.22.9.2 Contingency Measures and Implementation Schedules for the Nonattainment Areas, the Utah Division of Air Quality identifies Offset Ratios as a contingency measure if the area fails to make reasonable progress or meet attainment by the necessary date. In part it states:

*"Part of the State's permitting program requires that the owner of a new stationary source or an existing stationary source seeking to make a modification must first obtain offsetting emission reduction credits if the proposed increase in emissions rises to certain prescribed levels."*

Currently, PacifiCorp has secured and banked emission reduction credits for future projects. It is PacifiCorp's understanding that, although the offset ratio may change in the future, the SIP does not reduce or impact any of the existing banked emissions credits. PacifiCorp strongly supports this position.

Please call Steve Jensen at (801) 220-4639 or myself at (801) 220-4581 if you have any questions regarding the requests.

Sincerely,

A handwritten signature in blue ink, appearing to read "William K. Lawson", with a long horizontal flourish extending to the right.

William K. Lawson

PacifiCorp Energy

Director of Environmental Services